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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	Chapter: 13
)	
JANUSZ STEPLOWSKI,)	Case No.: 05-11484
)	
)	Judge: Hon. John H. Squires
Debtor.)	Hearing Date: 4/21/06
)	10:30 AM

**NOTICE OF TRUSTEE'S APPLICATION
FOR ATTORNEYS' FEES AS AN ADMINISTRATIVE EXPENSE CLAIM**

TO: See Service List

PLEASE TAKE NOTICE THAT ON **Friday, April 21, 2006 at 10:30 a.m.** or as soon thereafter as Counsel may be heard, I shall present before the Honorable Judge **John H. Squires**, or any Judge sitting in his stead, in **Courtroom 2000** of the **DuPage County Courthouse, 505 North County Farm Road, Wheaton Illinois** the attached Trustee's Application for Fees as an Administrative Expense, at which time you may appear as you deem necessary.

David R. Brown, Trustee
SPRINGER, BROWN, COVEY, GAERTNER & DAVIS, LLC
400. S. County Farm Road, Ste. 330
Wheaton, IL 60187
(630) 510-0000

CERTIFICATE OF SERVICE

I, David R. Brown, an attorney, on oath state that I caused to be served this Notice. Motion and proposed Order by mailing and/or electronically serving where available a copy to all parties shown and deposition same in the U.S. Mail at Wheaton, Illinois before 5:45 p.m. on March 29, 2006 with proper postage prepaid.

/s/ David R. Brown /s/

SERVICE LIST

Janusz Steplowski
4553 Whitney Drive
Hanover Park, IL 60133

Citibank (USA) NA
PO Box 182140
Columbus, OH 43218

U.S. Trustee
227 West Monroe Street
Suite 3350
Chicago, IL 60606
(ECF Service)

Discover Bank
PO Box 8063
Hilliard, OH 43026

Bernard A Schlosser
181 S. Bloomingdale Road
Bloomingdale, IL 60108

Discover Financial
Bankruptcy Department
PO Box 15251
Wilmington, DE 19886

Glenn Stearns
Chapter 13 Trustee
4343 Commerce Court, Suite 120
Lisle, IL 60532
(ECF Service)

Fleet
Bankruptcy Department
PO Box 12070
Newark, NJ 01701

Baker, Miller, Markoff, Krasny
Bankruptcy Department
29 N. Wacker Drive
Chicago, IL 60606

Household Credit Services
PO Box 5222
Carol Stream, IL 60197

Bank One
Bankruptcy Department
PO Box 1513
Wilmington, DE 19886-5153

Marshall Fields
Bankruptcy Department
111 Boulder Industrial Drive
Bridgeton, MO 63044

Blatt, Hasenmiller, Leibsker & Moore
125 S. Wacker Drive
Suite 400
Chicago, IL 60606

MBNA America
Bankruptcy Department
PO Box 15137
Wilmington, DE 19886

Direct TV
Attn: Bankruptcy Department
PO Box 9001069
Louisville, KY 40290

Providian
Bankruptcy Department
PO Box 66022
Dallas, TX 75266-0022

Sears
Bankruptcy Department
PO Box 182156
Columbus, H 43218

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**TRUSTEE'S APPLICATION FOR ALLOWANCE OF ATTORNEY'S FEES
AS AN ADMINISTRATIVE EXPENSE CLAIM**

NOW COMES the Trustee in the pre-conversion Chapter 7 Estate, DAVID R. BROWN (herein "Trustee"), by and through his attorneys, SPRINGER, BROWN, COVEY, GAERTNER & DAVIS, LLC, and moves this Court pursuant to 11 U.S.C. §§330(a), 503(b)(2) and 507(a)(1) and Federal Rules of Bankruptcy Procedure ("FRBP") 2002, and requests entry of an Order allowing the Trustee's fees in the amount of \$2,505.00 as an Administrative Expense Claim to be paid through the Debtor's Chapter 13 proceeding. In support of this Motion, Trustee respectfully states to this Court as follows:

1. On March 29, 2005, the Debtor filed his petition for relief under Chapter 7 of the United States Bankruptcy Code (the "Code") under 11 U.S.C. §101 et. seq.

2. Thereupon, David R. Brown was appointed as Trustee and continued to serve in that capacity until this matter was converted to a case under Chapter 13 on February 24, 2006.

3. According to Debtor's Schedules, he owned no real estate at the time of commencement of this case.

4. However, at the meeting of creditors, Debtor testified that he held a legal one-half interest in his residence, though he asserted that the entire equitable interest was held by his non-Debtor spouse. Trustee requested documentation supporting that contention, and was ultimately furnished various documents.

5. Trustee determined that the Bankruptcy Estate was entitled to a one-half interest in the residence located at 45553 Whitney Drive, Hanover park, Illinois (in which there appeared to be substantial equity), and filed his Complaint to Sell Real Estate free and clear of interest of co-owner, Adv. No. 05-02544.

6. Debtor then fired his original attorneys and retained Bernard Schlosser to represent him herein. Debtor filed his Answer to the Complaint and an Amended Answer thereafter.

7. Before any further discovery could be conducted, on February 24, 2006, Debtor converted this Chapter 7 case to one under Chapter 13 of the Bankruptcy Cod.

8. Debtor's conversion of his Chapter 7 to Chapter 13 is due to the Trustee discovering, investigating and pursuing the Subject Property as an asset of the bankruptcy estate for the benefit of creditors. Accordingly, the efforts of the Trustee and his counsel benefited the estate.

9. Prior to receiving the Notice and Motion to Convert, The Trustee incurred attorneys' fees in the total amount of \$3,034.00 in administering the estate in preparation to sell the subject property. Services were rendered by David R. Brown, whose billing rate throughout was \$325.00 per hour, Michelle Springer, whose billing rate throughout was \$250,000, and Christopher Hales, whose billing rate throughout was \$185.00 A detailed list of attorney time entries is attached hereto and incorporated as Exhibit A

10. The Trustee requests allowance of attorney fees in the amount of \$3,034.00 as an Administrative Claim and for payment of said fees as a priority claim pursuant to the Debtor's Chapter 13 plan.

WHEREFORE, for the foregoing reasons, Trustee David R. Brown prays for the entry of an Order allowing the Trustee's attorneys' fees in the amount of \$3,034.00 as an Administrative Expense Claim to be paid by the Debtor pursuant to the terms of the Debtor's Chapter 13 plan and for such other and further relief as this Court deems just and equitable.

DATE: March 29, 2006

Respectfully Submitted,
David, R. Brown, Trustee

BY: Springer, Brown, Covey, Gaertner & Davis LLC

By: /s/ David R. Brown /s/
One of His Attorneys

David R. Brown (ARDC 3122323)
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